

EXHIBIT 131

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

FAIR FIGHT ACTION, INC., *et al.*,

Plaintiffs,

v.

**BRAD RAFFENSPERGER, in his official
Capacity as Secretary of State of Georgia;
et al.,**

Defendants.

Civil Action File No.

1:18-cv-05391-SCJ

DECLARATION OF CHRIS HARVEY

Pursuant to 28 U.S.C. § 1746, I, CHRIS HARVEY, make the following declaration in support of Defendants' Motion for Summary Judgment on the Merits of Plaintiffs' Claims:

1.

My name is Chris Harvey. I am over the age of 21 years, and I am under no legal disability which would prevent me from giving this declaration. If called to testify, I would testify under oath to these facts.

2.

I currently am the Director of Elections in the Office of the Georgia Secretary of State. I have held that position since July 2015. From August 2007 to July 2015, I was the Chief Investigator and Deputy Inspector General for the

Secretary of State's office, investigating, among other things, potential violations of state election law. For more than a decade, I have acquired firsthand knowledge of Georgia's election processes at both the state and county level.

3.

On December 30, 2019, the Secretary of State ("Secretary") decertified the direct-electronic recording ("DRE") voting machine system, which had been in use in Georgia, including during the November 2018 election. A true and correct copy of the Decertification of the DREs is attached as **Exhibit A**.

This occurred at the end of a process to purchase and deploy a replacement for the DREs called ballot-marking devices ("BMDs"), which the Secretary certified on August 9, 2019 for use throughout the state as O.C.G.A. § 21-2-300(a)(2) requires. The BMDs have been fully distributed and are in use in all counties in Georgia.

4.

In accordance with Ga Comp. R. & Regs. 590-8-3-.01, on December 31, 2019, the Secretary certified that the Voter Registration System is being maintained in a manner consistent with the standards set forth Ga Comp. R. & Regs. 590-8-3-.01(b) and that the standards set forth therein had been reviewed to ensure they remain generally consistent with industry standards. A true and

correct copy of the Secretary's certification of compliance with this rule is attached as **Exhibit B**.

5.

Since December 19, 2019, the Secretary restored Charlesetta B. Young from cancelled status to inactive status. As of June 22, 2020, Ms. Young's voter status remained inactive. A copy of Ms. Young's Enet voter registration information is attached as **Exhibit C**.

6.

Enet voter registration information shows that, since December 19, 2019, David Hopkins, Kilton Smith, and Clifford Douglas Thomas each re-registered to vote and, at least as of June 22, 2020, appear on the list of active voters. Mr. Thomas also voted in the June 2020 primary. Copies of the Enet voter registration information for Mr. Hopkins, Mr. Smith, and Mr. Thomas are attached as **Exhibit D**.

7.

There are approximately 2,300 polling places in Georgia.

8.

Firefly is an electronic communications system that allows the Secretary's Office to communicate with County-level officials.

9.

The Secretary's Office often prepares and disseminates Election Nuggets, Election Updates, "3T's," presentations to members of the Georgia Association of Voter Registration and Election Officials (and/or its predecessor entities the Voter Registrars Association of Georgia and the Georgia Association of Election Officials), Poll Worker Manuals and Certification Courses. A true and correct copy of those documents is attached to State Defendants' Motion for Summary Judgment as **Exhibit (90)**.

10.

A true and correct copy of a 2015 press release announcing the Secretary's publicly available poll worker training resource page is attached to State Defendants' Motion for Summary Judgment as **Exhibit (76)**.

11.

A true and correct copy of a May 22, 2019 email I received reporting Georgia's membership in the Electronic Registration Information Center, a nonprofit organization that assists states with keeping accurate voter registration rolls is attached to State Defendants' Motion for Summary Judgment as **Exhibit (68)**.

[Signature appears on following page]

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of June, 2020.



CHRIS HARVEY

Exhibit A



OFFICE OF SECRETARY OF STATE

I, Brad Raffensperger, Secretary of State of the State of Georgia, do hereby certify that

pursuant to the authority granted to the Secretary of State by Title 21, Chapter 2 of the Official Code of Georgia, the AccuVote Voting System, consisting of the Global Election Management System (GEMS), AccuVote TS R6 DRE Voting Station, AccuVote TSX DRE Voting Station, AccuVote OS Optical Scanner, ExpressPoll 4000 Electronic Poll Book, and ExpressPoll 5000 Electronic Poll Book, can no longer be lawfully used in Georgia beginning on January 1, 2020. Therefore, the previous certifications for the aforementioned system are hereby revoked, and the system is no longer certified for use in any primaries or elections in this state.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of my office, at the Capitol, in the City of Atlanta, this 30th day of December, in the year of our Lord Two Thousand and Nineteen and of the Independence of the United States of America the Two Hundred and Forty-Fourth



Brad Raffensperger

Brad Raffensperger, Secretary of State

Exhibit B



OFFICE OF SECRETARY OF STATE

I, Brad Raffensperger, Secretary of State of the State of Georgia, do hereby certify that

the Georgia Voter Registration System is being maintained in a manner consistent with the standards set forth in section (b) of Georgia Rule 590-8-3-01 and that the standards set forth in said rule have been reviewed to ensure that they remain generally consistent with industry standards.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of my office, at the Capitol, in the City of Atlanta, this 31st day of December, in the year of our Lord Two Thousand and Nineteen and of the Independence of the United States of America the Two Hundred and Forty-Fourth



Brad Raffensperger
Brad Raffensperger, Secretary of State

Exhibit C

Inquiry > Voter Registration

Inquiry - View Voter Registration

Voter Information		Residence Address		Voting Districts	
Voter Name:	CHARLESETTA B YOUNG	Street No.:	[REDACTED]	Congressional	001
Date of Birth:	[REDACTED]	Street Name:	[REDACTED]	Senate	002
Race:	BLACK NOT OF HISPANIC ORIGIN	Suffix:		House	165
Gender:	FEMALE	Apt/Unit:		Judicial	EAST
Voter Registration #:	[REDACTED]	Address Line 2:			
Registration Date:	01/13/2012	Municipality:	SAVANNAH		
Current Status:	INACTIVE	Postal City:	SAVANNAH		
Status Reason:	NO CONTACT	County:	CHATHAM		
Voter Phone:		Zip Code:	31404 - 3705		
E-mail:		State:	GA		
DL #/State ID:	[REDACTED]	Added Date:	02/02/2012	County Precinct:	2-09C
Site ID / Location:	01 - DDS	Change/Audit Date:	12/23/2019	Municipal Precinct:	2-09S
SSN (Full OR Last 4 Digits):	[REDACTED]	Date of Last Contact:	01/13/2012	Voting Area/Combo #:	00409
ID Required:	NO	Date of Last Status Change:	12/23/2019	County Polling Place:	THE SALVATION ARMY 3000 BEE RD SAVANNAH, GA 31404 - 0000
US Citizen:	YES	Poll Worker Interest:		Municipal Polling Place:	THE SALVATION ARMY 3000 BEE RD SAVANNAH, GA 31404 - 0000
Challenged Elector:	NO				

VoteSafe: [Display Actual Address](#) [Display Signature](#)

Mailing Address

Street No.: Apt/Unit:
 Suffix: Mailing City:
 Street Name / PO Box: Mailing State:
 Address Line 2: Zip Code:

User Name	Date/Time	Memo
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Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
CHARLESETTA B YOUNG	01/13/2012	[REDACTED]	[REDACTED]

Previous Status:

Status	Status Reason	Date changed	User Name
CANCELLED	NO ACTIVITY FOR 2 GENERAL ELECTION CYCLES	12/23/2019	SYSTEM
INACTIVE	NO CONTACT	12/16/2019	SYSTEM
ACTIVE		08/08/2015	CONFIRMATION NOTICE

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
CHARLESETTA B YOUNG	01/13/2012	[REDACTED]	[REDACTED]

Date	Election Type	Election Category	Ballot Type	Challenged	Challenged Reason	Challenged Status	Party	Counted	Comments	County	Vote Cast In
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Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
CHARLESETTA B YOUNG	01/13/2012	[REDACTED]	[REDACTED]

Change/Audit Date - Time	Action	Type of Change	Date of Last Contact	Change Reason	County	Changed User ID	Site ID/Location
12/23/2019 1:57 PM	CHANGE	Status	01/13/2012	SYSTEM REVISION LEGAL		SYSTEM	
12/16/2019 11:15 PM	CHANGE	Status	01/13/2012	No Activity For 2 General Election Cycles		SYSTEM	
09/03/2015 8:43 PM	CHANGE	Districts	01/13/2012	REDISTRICTING		REDISTRICTING	
08/08/2015 10:30 PM	CHANGE	Status	01/13/2012	NO CONTACT		CONFIRMATION NOTICE	
04/19/2012 12:00 AM	NEW VOTER		01/13/2012	CON		ENETCONV	01 - DDS

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
CHARLESETTA B YOUNG	01/13/2012	[REDACTED]	[REDACTED]

Notice Type	Date Sent	Response Date	Comments	Letter								
CN	11/06/2019	Didn't respond within 40 days	NGE Notices									
CN	06/29/2015	Didn't respond within 40 days	Confirmation Notices									
Previous												
<table border="1" style="width: 100%;"><tr><td style="width: 25%;">Voter Name</td><td style="width: 25%;">Registration Date</td><td style="width: 25%;">Voter Registration #</td><td style="width: 25%;">Voter Address</td></tr><tr><td>CHARLESETTA B YOUNG</td><td>01/13/2012</td><td>[REDACTED]</td><td>[REDACTED]</td></tr></table>					Voter Name	Registration Date	Voter Registration #	Voter Address	CHARLESETTA B YOUNG	01/13/2012	[REDACTED]	[REDACTED]
Voter Name	Registration Date	Voter Registration #	Voter Address									
CHARLESETTA B YOUNG	01/13/2012	[REDACTED]	[REDACTED]									
Date of Cancellation	Status	Reject/Cancelled Reason	Comments									
12/16/2019	Cancelled	No Activity For 2 General Election Cycles										
Previous												

Exhibit D

Inquiry > Voter Registration

Inquiry - View Voter Registration

Voter Information		Residence Address		Voting Districts	
Voter Name:	DAVID HOPKINS	Street No.:	[REDACTED]	Congressional	012
Date of Birth:	[REDACTED]	Street Name:	[REDACTED]	Senate	022
Race:	BLACK NOT OF HISPANIC ORIGIN	Suffix:		House	126
Gender:	MALE	Apt/Unit:		Judicial	AUGU
Voter Registration #:	[REDACTED]	Address Line 2:			
Registration Date:	02/13/2020	Municipality:			
Current Status:	ACTIVE	Postal City:	HEPHZIBAH		
Status Reason:		County:	RICHMOND		
Voter Phone:	[REDACTED]	Zip Code:	30815		
E-mail:		State:	GA		
DL #/State ID:	[REDACTED]	Added Date:	09/30/2008		
Site ID / Location:	02 - MAIL-IN APPLICATIONS	Change/Audit Date:	04/23/2020		
SSN (Full OR Last 4 Digits):	[REDACTED]	Date of Last Contact:	02/13/2020		
ID Required:	NO	Date of Last Status Change:	03/02/2020		
US Citizen:	YES	Poll Worker Interest:			
Challenged Elector:	NO				

VoteSafe: [Display Actual Address](#) [Display Signature](#)

Mailing Address

Street No.:	Apt/Unit:
Suffix:	Mailing City:
Street Name / PO Box:	Mailing State:
Address Line 2:	Zip Code:

User Name	Date/Time	Memo
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Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
DAVID HOPKINS	02/13/2020	[REDACTED]	[REDACTED]

Previous Address:

[REDACTED]											
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Previous Status:

Status	Status Reason	Date changed	User Name
CANCELLED	NO ACTIVITY FOR 2 GENERAL ELECTION CYCLES	03/02/2020	121AMALONE
INACTIVE	NO CONTACT	12/16/2019	SYSTEM
ACTIVE		08/08/2015	CONFIRMATION NOTICE

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
DAVID HOPKINS	02/13/2020	[REDACTED]	[REDACTED]

Date	Election Type	Election Category	Ballot Type	Challenged	Challenged Reason	Challenged Status	Party	Counted	Comments	County Vote Cast In
11/04/2008	GENERAL	STATE WIDE	Regular					Yes		RICHMOND

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
DAVID HOPKINS	02/13/2020	[REDACTED]	[REDACTED]

Change/Audit Date - Time	Action	Type of Change	Date of Last Contact	Change Reason	County	Changed User ID	Site ID/Location
04/23/2020 1:12 PM	CHANGE	Residence Address, Other	02/13/2020	USER CORRECTION	RICHMOND	121KJOYNER	
03/02/2020 2:48 PM	CHANGE	Status, Other	02/13/2020		RICHMOND	121AMALONE	02 - Mail-In Applications
12/16/2019 11:15 PM	CHANGE	Status	11/29/2010	No Activity For 2 General Election Cycles		SYSTEM	
08/08/2015 10:30 PM	CHANGE	Status	11/29/2010	NO CONTACT		CONFIRMATION NOTICE	
02/27/2014 2:54 AM	CHANGE	Districts	11/29/2010	REDISTRICTING		REDISTRICTING	
05/23/2012 12:00 AM	NEW VOTER		11/29/2010	CON		ENETCONV	01 - DDS

Previous

Voter Name DAVID HOPKINS	Registration Date 02/13/2020	Voter Registration # [REDACTED]	Voter Address [REDACTED]
Notice Type CN CN	Date Sent 11/06/2019 06/29/2015	Response Date Didn't respond within 40 days Didn't respond within 40 days	Comments NGE Notices Confirmation Notices
Previous			
Voter Name DAVID HOPKINS	Registration Date 02/13/2020	Voter Registration # [REDACTED]	Voter Address [REDACTED]
Date of Cancellation 12/16/2019	Status Cancelled	Reject/Cancelled Reason No Activity For 2 General Election Cycles	Comments
Previous			

Inquiry > Voter Registration

Inquiry - View Voter Registration

Voter Information		Residence Address		Voting Districts	
Voter Name:	KILTON SMITH	Street No.:	[REDACTED]	Congressional	008
Date of Birth:	[REDACTED]	Street Name:	[REDACTED]	Senate	020
Race:	BLACK NOT OF HISPANIC ORIGIN	Suffix:	[REDACTED]	House	147
Gender:	MALE	Apt/Unit:	[REDACTED]	Judicial	HOUS
Voter Registration #:	[REDACTED]	Address Line 2:		County Districts	
Registration Date:	03/25/2020	Municipality:	WARNER ROBINS	Commission	LRG
Current Status:	ACTIVE	Postal City:	WARNER ROBINS	School	4
Status Reason:		County:	HOUSTON	Municipal Districts	
Voter Phone:		Zip Code:	31088	City Council	5
E-mail:		State:	GA	County Precinct:	RECR
DL #/State ID:	[REDACTED]	Added Date:	12/06/2011	Municipal Precinct:	REC
Site ID / Location:	02 - MAIL-IN APPLICATIONS	Change/Audit Date:	04/01/2020	Voting Area/Combo #:	00439
SSN (Full OR Last 4 Digits):	[REDACTED]	Date of Last Contact:	03/25/2020	County Polling Place:	WR RECREATION - MCINTYRE ROOM 800 WATSON BLVD WARNER ROBINS, GA 31093 - 0000
ID Required:	NO	Date of Last Status Change:	04/01/2020	Municipal Polling Place:	WR RECREATION - MCINTYRE ROOM 800 WATSON BLVD WARNER ROBINS, GA 31093 - 0000
US Citizen:	YES	Poll Worker Interest:			
Challenged Elector:	NO				

VoteSafe: Display Actual Address Display Signature

Mailing Address

Street No.: Apt/Unit:
Suffix: Mailing City:
Street Name / PO Box: Mailing State:
Address Line 2: Zip Code:

User Name

Date/Time

Memo

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
KILTON SMITH	03/25/2020	[REDACTED]	[REDACTED]

Previous Address:

Street No	Street Name	Apt/Unit	Suffix	Address Line 2	City	State	Zip Code
[REDACTED]	[REDACTED]				WARNER ROBINS	GA	31088 - 3408

Previous Status:

Status	Status Reason	Date changed	User Name
CANCELLED	NO ACTIVITY FOR 2 GENERAL ELECTION CYCLES	04/01/2020	076SYOUNG
INACTIVE	NO CONTACT	12/16/2019	SYSTEM
ACTIVE		08/08/2015	CONFIRMATION NOTICE

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
KILTON SMITH	03/25/2020	[REDACTED]	[REDACTED]

Date	Election Type	Election Category	Ballot Type	Challenged	Challenged Reason	Challenged Status	Party	Counted	Comments	County	Vote Cast In
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Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
KILTON SMITH	03/25/2020	[REDACTED]	[REDACTED]

Change/Audit Date - Time	Action	Type of Change	Date of Last Contact	Change Reason	County	Changed User ID	Site ID/Location
04/01/2020 10:23 AM	CHANGE	Residence Address, Status, Other	03/25/2020		HOUSTON	076SYOUNG	02 - Mail-In Applications
12/16/2019 11:15 PM	CHANGE	Status	12/06/2011	No Activity For 2 General Election Cycles		SYSTEM	
07/21/2017 8:16 PM	CHANGE	Districts	12/06/2011	REDISTRICTING		REDISTRICTING	
08/08/2015 10:30 PM	CHANGE	Status	12/06/2011	NO CONTACT		CONFIRMATION NOTICE	
01/11/2013 6:59 PM	NEW VOTER		12/06/2011	CON		ENETCONV	01 - DDS

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
KILTON SMITH	03/25/2020	[REDACTED]	[REDACTED]

Notice Type	Date Sent	Response Date	Comments	Letter
CN	11/06/2019	Didn't respond within 40 days	NGE Notices	
CN	06/29/2015	Didn't respond within 40 days	Confirmation Notices	

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
KILTON SMITH	03/25/2020	[REDACTED]	[REDACTED]

Date of Cancellation	Status	Reject/Cancelled Reason	Comments
12/16/2019	Cancelled	No Activity For 2 General Election Cycles	

Previous

Inquiry > Voter Registration

Inquiry - View Voter Registration

Voter Information		Residence Address		Voting Districts	
Voter Name:	CLIFFORD DOUGLAS THOMAS	Street No.:	[REDACTED]	Congressional	99999
Date of Birth:	[REDACTED]	Street Name:	[REDACTED]	Senate	99999
Race:	BLACK NOT OF HISPANIC ORIGIN	Suffix:		House	99999
Gender:	MALE	Apt/Unit:		Judicial	99999
Voter Registration #:	[REDACTED]	Address Line 2:		County Districts	
Registration Date:	02/24/2020	Municipality:	SOUTH FULTON	Commission	99999
Current Status:	ACTIVE	Postal City:	COLLEGE PARK	Municipal Districts	
Status Reason:		County:	FULTON	County Precinct:	88888
Voter Phone:	[REDACTED]	Zip Code:	30349 - 6541	Municipal Precinct:	-
E-mail:		State:	GA	Voting Area/Combo #:	00000
DL #/State ID:	[REDACTED]	Added Date:	10/12/2005	County Polling Place:	
Site ID / Location:	02 - MAIL-IN APPLICATIONS	Change/Audit Date:	06/08/2020	Municipal Polling Place:	
SSN (Full OR Last 4 Digits):	[REDACTED]	Date of Last Contact:	06/08/2020		
ID Required:	NO	Date of Last Status Change:	03/04/2020		
US Citizen:	YES	Poll Worker Interest:	NO		
Challenged Elector:	NO				

VoteSafe: Display Actual Address Display Signature

Mailing Address

Street No.:	Apt/Unit:
Suffix:	Mailing City:
Street Name / PO Box:	Mailing State:
Address Line 2:	Zip Code:

User Name	Date/Time	Memo
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Previous

Previous Address:

Street No	Street Name	Apt/Unit	Suffix	Address Line 2	City	State	Zip Code
████████	████████				COLLEGE PARK	GA	30349 - 6541
					COLLEGE PARK	GA	30349 - 6541

Previous Status:

Status	Status Reason	Date changed	User Name
CANCELLED	NO ACTIVITY FOR 2 GENERAL ELECTION CYCLES	03/04/2020	060CWALKER
INACTIVE	NO CONTACT	12/16/2019	SYSTEM
ACTIVE		08/08/2015	CONFIRMATION NOTICE

Previous

Date	Election Type	Election Category	Ballot Type	Challenged	Challenged Reason	Challenged Status	Party	Counted	Comments	County	Vote Cast In
06/09/2020	GENERAL PRIMARY	STATE WIDE	Absentee					Yes			FULTON

Previous

Voter Name	Registration Date	Voter Registration #	Voter Address
CLIFFORD DOUGLAS THOMAS	02/24/2020	[REDACTED]	[REDACTED]

Change/Audit Date - Time	Action	Type of Change	Date of Last Contact	Change Reason	County	Changed User ID	Site ID/Location
06/08/2020 2:56 PM	CHANGE	Other	06/08/2020	ABSENTEE BALLOT	FULTON	060CFICKLIN	
05/08/2020 6:25 PM	CHANGE	Other	05/08/2020	ABSENTEE BALLOT	FULTON	060CWALKER	
03/04/2020 11:23 AM	CHANGE	Status, Other	02/24/2020		FULTON	060CWALKER	02 - Mail-In Applications
12/16/2019 11:15 PM	CHANGE	Status	10/01/2010	No Activity For 2 General Election Cycles		SYSTEM	
12/16/2016 1:54 PM	CHANGE	Residence Address	10/01/2010	REDISTRICTING	FULTON	060SMOSS	
08/08/2015 10:30 PM	CHANGE	Status	10/01/2010	NO CONTACT		CONFIRMATION NOTICE	
01/06/2014 3:23 PM	CHANGE	Residence Address	10/01/2010	REDISTRICTING	FULTON	060SMARSHALL	

06/26/2012 12:00 AM	NEW VOTER	10/01/2010	CON	ENETCONV11	01 - DDS
Previous					
	Voter Name CLIFFORD DOUGLAS THOMAS	Registration Date 02/24/2020	Voter Registration # [REDACTED]	Voter Address [REDACTED]	
Notice Type CN CN	Date Sent 11/06/2019 06/29/2015	Response Date Didn't respond within 40 days Didn't respond within 40 days		Comments NGE Notices Confirmation Notices	Letter
Previous					
	Voter Name CLIFFORD DOUGLAS THOMAS	Registration Date 02/24/2020	Voter Registration # [REDACTED]	Voter Address [REDACTED]	
Date of Cancellation 12/16/2019	Status Cancelled	Reject/Cancelled Reason No Activity For 2 General Election Cycles		Comments	
Previous					